

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CHARLENE CARTER,)

Plaintiff,)

VS.) CIVIL ACTION

SOUTHWEST AIRLINES CO.,) NO.: 3:17-cv-02278-X
and TRANSPORT WORKERS)
UNION OF AMERICA, LOCAL)
556,)

Defendants.)

VIDEOCONFERENCE ORAL DEPOSITION OF
LINDA RUTHERFORD
JUNE 23, 2022

VIDEOCONFERENCE ORAL DEPOSITION OF LINDA RUTHERFORD, produced as a witness at the instance of the Plaintiff, and duly sworn, was taken in the above-styled and numbered cause on June 23, 2022, from 12:03 p.m. to 1:06 p.m., via Zoom Videoconference, before Melody A. Monk, CSR in and for the State of Texas, reported by machine shorthand, at the law offices of office address,

APPEARANCES
(All parties appearing via Zoom Videoconference)

FOR THE PLAINTIFF:

MATTHEW D. HILL
Pryor & Bruce
302 North San Jacinto
Rockwall, Texas 75087
972.771.3933
Mhill@pryorandbruce.com

MATTHEW B. GILLIAM
National Right to Work Legal Defense
Foundation, Inc.
8001 Braddock Road
Suite 600
Springfield, Virginia 22160
703.321.8510
Mbg@nrtw.org

FOR THE DEFENDANT SOUTHWEST AIRLINES CO.:

PAULO B. MCKEEBY
Reed Smith
2850 North Harwood Street
Suite 1500
Dallas, Texas 75201
Pmckeeby@reedsmith.com

FOR THE DEFENDANT TRANSPORT WORKERS UNION OF AMERICA LOCAL 556:

EDWARD B. CLOUTMAN, III
Law Offices of Edward Cloutman III
3301 Elm Street
Dallas, Texas 75226
214.232.9015
Ecloutman@lawoffices.email

pursuant to the Federal Rules of Civil Procedure,
and the provisions stated on the record or
attached hereto.

ADAM S. GREENFIELD
Cloutman & Greenfield, PLLC
3301 Elm Street
Dallas, Texas 75226
Agreenfield@candglegal.com

ALSO PRESENT:

Charlene Carter
Chris Maberry, Senior Attorney - Southwest
Airlines
Kerrie Forbes, Associate General Counsel -
Southwest Airlines
Lauren Armstrong, Paralegal - Southwest
Airlines

Page 5	
1	INDEX
	PAGE
2	Appearances..... 2
3	
4	LINDA RUTHERFORD
5	EXAMINATION BY MR. HILL..... 7
6	Witness's Signature Page..... 52
7	Reporter's Certificate Page..... 55
8	
9	EXHIBITS
10	NO. DESCRIPTION PAGE
11	63 - January 20, 2017 Email.....12
	62 - January 20, 2017 Email.....23
12	37 - Inflight Info on the Go January 20, 2017
	Political Activities.....26
13	139 - January 24, 2017 Email.....27
	9 - Southwest Airlines Employee Social Media
14	Policy.....33
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	

Page 6

1 THE REPORTER: We are on the record
2 for the deposition of Linda Rutherford in the case
3 of Charlene Carter versus Southwest Airlines
4 Company and Transport Workers Union of America
5 Local 556, Civil Case No. 3:17-cv-02278-X at
6 12:03 p.m. on June 23rd, 2022.
7 Will counsel please state their
8 appearances for the record.
9 MR. MCKEEBY: Paulo McKeeby appearing
10 on behalf of Southwest Airlines.
11 MR. CLOUTMAN: Ed Cloutman on behalf
12 of TWU Local 556.
13 MR. HILL: Matt Hill and Matt Gilliam
14 on behalf of Charlene Carter.
15 THE REPORTER: Okay. Are there any
16 stipulations or agreements before I swear in the
17 witness?
18 MR. MCKEEBY: No.
19 MR. HILL: No.
20 MR. MCKEEBY: This is being taken
21 pursuant to the court's order in this case of
22 September -- I'm sorry, of June 16, 2022.
23 * * *
24 LINDA RUTHERFORD,
25 having been first duly sworn, testified as

Page 7

1 follows:
2 EXAMINATION
3 BY MR. HILL:
4 Q. Ms. Rutherford, can you introduce yourself
5 to the jury, please?
6 A. Yes, my name is Linda Rutherford, and I am
7 executive vice president of people and
8 communications for Southwest Airlines.
9 Q. Is that the same job you held in January
10 of 2017?
11 A. No.
12 Q. What job did you hold then?
13 A. Senior vice president of culture and
14 communications.
15 Q. What were your responsibilities as the
16 senior vice president of culture and
17 communications?
18 A. I worked with two departments in
19 particular, communications and outreach, so our
20 communications strategies, corporate philanthropy,
21 emergency response, as well as our culture and
22 engagement group, which is our employee
23 insights and data, employee surveying, our
24 recognition platform, and our culture events.
25 Q. On the communications side of this, is one

Page 8

1 of your roles to try and help shape the public
2 perception of Southwest Airlines?
3 A. Yes.
4 Q. And who, who reported to you in that role
5 you had back in 2017?
6 A. Two vice -- two now vice presidents, then
7 managing directors, so I had a, a -- Whitney
8 Eichinger, the managing director of culture and
9 engagement, and Laurie Barnett, the managing
10 director of communications and outreach.
11 Q. Okay. In terms of the communications and
12 outreach part of this, is a, is a good way to
13 describe what communications and outreach was that
14 you were responsible for what Southwest says to
15 the public?
16 A. That is a piece of that department's
17 responsibility.
18 Q. What are the other pieces?
19 A. They develop the social business strategy,
20 they manage a number of internal communications
21 channels, they manage media response, they manage
22 community relationships and partnerships, they
23 manage philanthropic contribution and investment,
24 and at the time they also managed the corporate
25 emergency response and business continuity plans.

Linda Rutherford

Page 9	Page 11
<p>1 Q. What is a social business strategy?</p> <p>2 A. That is a cross-functional group of people</p> <p>3 working with the people department, working with</p> <p>4 technology and marketing communications to help</p> <p>5 develop Southwest Airlines' voice among social</p> <p>6 channels. So started in -- many years ago with</p> <p>7 Facebook and Twitter.</p> <p>8 Q. So part of what you were doing was, was</p> <p>9 shaping how Southwest communicates via social</p> <p>10 media to the world?</p> <p>11 A. Part of it was to take the personality of</p> <p>12 Southwest Airlines and determine what that should</p> <p>13 look like in new ways, digital channels to reach</p> <p>14 our various stakeholders.</p> <p>15 Q. Part of that was probably also trying to,</p> <p>16 trying to manage what people were saying about</p> <p>17 Southwest, to the extent that's possible?</p> <p>18 MR. MCKEEBY: Object to the form of</p> <p>19 the question.</p> <p>20 A. Yeah, I don't --</p> <p>21 MR. MCKEEBY: Answer, if you</p> <p>22 understand.</p> <p>23 A. It -- can, can you clarify? Because you</p> <p>24 don't, you don't really manage much in social</p> <p>25 media.</p>	<p>1 Q. What is in those reports that you receive</p> <p>2 about what's being said on social media?</p> <p>3 A. So in, in 2017, we were getting started</p> <p>4 with our social listening. It would have been a</p> <p>5 daily report of major topics that were being</p> <p>6 discussed in the social channels that we</p> <p>7 monitored -- again, at that time, Facebook and</p> <p>8 Twitter -- and it would have reported major themes</p> <p>9 and perhaps the sentiment of those themes.</p> <p>10 Q. Would it flag individual users -- I'm</p> <p>11 sorry, would it flag individual Southwest</p> <p>12 employees that had said things on social media</p> <p>13 that had been -- become viral or become popular?</p> <p>14 MR. MCKEEBY: Object to the form of</p> <p>15 the question.</p> <p>16 You, you can answer.</p> <p>17 A. No.</p> <p>18 Q. Okay. Would it flag -- would, would you</p> <p>19 receive specific social media reports on specific</p> <p>20 issues that have been raised on social media?</p> <p>21 MR. MCKEEBY: Object to the form of</p> <p>22 the question.</p> <p>23 You can answer.</p> <p>24 A. The re -- reports are really derived --</p> <p>25 were, back in 2017, derived daily. So, in other</p>
Page 10	Page 12
<p>1 Q. Maybe the better way to, to under -- was</p> <p>2 one of your roles in that position to understand</p> <p>3 what it is that people are saying about Southwest</p> <p>4 on social media?</p> <p>5 A. Really the, the role of communications is</p> <p>6 to understand what is being said about Southwest</p> <p>7 Airlines by multiple stakeholders within the</p> <p>8 social business group, that would include what's</p> <p>9 being said on social digital channels.</p> <p>10 Q. Did you personally monitor what was said</p> <p>11 about Southwest on social media?</p> <p>12 A. I don't personally monitor, no.</p> <p>13 Q. Did, did you have reports that came to you</p> <p>14 about what was being said about Southwest on</p> <p>15 social media?</p> <p>16 A. I receive reports on a regular basis that</p> <p>17 we derive from our social listening activities.</p> <p>18 Q. And what -- what's in those reports?</p> <p>19 MR. MCKEEBY: Hey, Matt, are you</p> <p>20 talking about -- I just want to make sure they've</p> <p>21 got a time frame here. Are you talking now or in</p> <p>22 2017?</p> <p>23 MR. HILL: I'm talking about in 2017.</p> <p>24 A. So could you repeat the question? I'm</p> <p>25 sorry.</p>	<p>1 words, there wasn't a report necessarily on a</p> <p>2 specific topic or issue. It would have been a</p> <p>3 daily report on what the conversation was that was</p> <p>4 happening in social spaces where Southwest</p> <p>5 Airlines or the airline industry was being</p> <p>6 mentioned.</p> <p>7 Q. I'll direct your attention to Exhibit 63</p> <p>8 that I forwarded to Mr. McKeeby before the</p> <p>9 deposition. Can you look at that document,</p> <p>10 please. Do you have that?</p> <p>11 A. Do you have that -- yeah.</p> <p>12 MR. MCKEEBY: Matt, you sent this to</p> <p>13 me five minutes before the deposition. I</p> <p>14 forwarded it to -- I didn't forward it directly to</p> <p>15 Linda. Do you -- I don't know if there's a --</p> <p>16 MR. HILL: I can pop it up on the</p> <p>17 screen.</p> <p>18 MR. MCKEEBY: Yeah, do that. And this</p> <p>19 is what number?</p> <p>20 MR. HILL: 63.</p> <p>21 MR. MCKEEBY: Okay.</p> <p>22 (Exhibit 63 marked).</p> <p>23 Q. So the, the second e-mail string on</p> <p>24 Exhibit 63 is from a gentleman named Jim Ruppel.</p> <p>25 Do you know who Mr. Ruppel is?</p>

3 (Pages 9 to 12)

Linda Rutherford

<p style="text-align: right;">Page 13</p> <p>1 A. Yes, Jim Ruppel is the -- is a former VP 2 of customer relations and Rapid Rewards. 3 Q. And it says it's from WNCO.com. Do you 4 recognize that e-mail address? 5 A. Yes, it's a company e-mail address. 6 Q. Within Southwest? 7 A. Yes. 8 Q. Okay. Now, Mr. Ruppel attaches a report 9 that he received from other Southwest employees 10 that talks about information received about a pink 11 cabin lights issue. Are you familiar with reports 12 like the one that's pictured on Exhibit 63? 13 A. I -- I've, I've seen periodic reports. 14 This looks to be a customer relations reporting. 15 Q. Okay. So that's different from the social 16 media reports that you were getting? 17 A. That's correct. 18 Q. Okay. Would you receive also the customer 19 reports like, like what was pictured in 20 Exhibit 63? 21 A. Not on a recurring basis. 22 Q. Okay. Are there any efforts to monitor 23 what Southwest employees are saying on social 24 media? 25 A. No.</p>	<p style="text-align: right;">Page 15</p> <p>1 there's a process to look at whether a policy had 2 been violated. That's not something that our team 3 directs. 4 Q. But your team, are -- you're not -- let's, 5 let's narrow that then for you, and we can then 6 explore the other part. 7 You're not aware of any efforts by 8 your team to investigate a particular employee's 9 posts on social media? 10 A. Correct. 11 Q. Now, more broadly, who is it that does 12 investigate individual social media posts by 13 particular employees? 14 A. I don't know specifically. The social -- 15 the company's social media policy outlines how 16 that process works and who's involved. 17 Q. Does the communications team have an issue 18 with employees taking political positions on their 19 social media? 20 MR. MCKEEBY: Object to the form of 21 the question. It's a hypothetical. 22 You can answer. 23 A. It depends. 24 Q. There are certain political opinions that 25 the communications team doesn't want employees to</p>
<p style="text-align: right;">Page 14</p> <p>1 MR. MCKEEBY: I'm just objecting to 2 the form of that question. I think she's already 3 answered anyway. So proceed. 4 Q. Were there any efforts to monitor what 5 social -- I'm sorry, what Southwest employees said 6 on social media in 2017? 7 MR. MCKEEBY: Same objection. 8 A. The, the, the social listening center 9 captures conversations, but it's meant to be 10 reported in the aggregate by topic. 11 Q. Okay. Is there any differentiation made 12 for social posts that are made by Southwest 13 employees? 14 A. Not to my knowledge, no. 15 Q. Have there ever been any efforts made to 16 investigate -- that you're aware of, to, to 17 investigate a particular employee's comments on 18 social media? 19 A. There -- 20 MR. MCKEEBY: Are you talking about 21 our team, by her? 22 A. By, by the communications team? 23 Q. Anything you're aware of. 24 A. We have a social media policy; if there 25 were violations of the social media policy,</p>	<p style="text-align: right;">Page 16</p> <p>1 take on social media? 2 A. This, this is not about a particular 3 political opinion. It would be about whether the 4 employee's conduct in a social media channel and 5 their nexus to their employment violated a policy. 6 Q. What -- can you describe for me 7 Southwest's general position on its desire to 8 take -- to, to be associated with political 9 positions at all? Does it, does it have a 10 philosophy on that? 11 A. The, the general philosophy is that we 12 spend our time focused on running a really good 13 airline and getting people safely and affordably 14 where they need to go. We -- you know, we're not 15 interested in taking a -- political positions. 16 That's not our, that's not our primary focus. 17 Q. And in terms of employees expressing their 18 own political opinions on social media, is -- 19 Southwest is -- at least your communications team 20 is not in the business of policing that issue, 21 right? 22 A. The communications team is, is, is 23 reporting on general topics and themes. If, in 24 the process of collecting and reporting on those 25 themes, they find a violation, they turn it over</p>

4 (Pages 13 to 16)

Linda Rutherford

<p style="text-align: right;">Page 17</p> <p>1 to the people in social media policy who are</p> <p>2 responsible for investigating that.</p> <p>3 Q. Who would you turn that over to?</p> <p>4 A. I don't know specifically. It's listed in</p> <p>5 the policy who would be in charge of that, that</p> <p>6 inquiry.</p> <p>7 Q. Have you ever turned an employee over for</p> <p>8 expressing political opinions on their social</p> <p>9 media?</p> <p>10 A. I have not personally, no.</p> <p>11 Q. Have you ever expressed any opinions on</p> <p>12 your social media?</p> <p>13 MR. MCKEEBY: Political opinions?</p> <p>14 MR. HILL: That's right.</p> <p>15 A. Political opinions? I, I honestly don't,</p> <p>16 I don't recall.</p> <p>17 Q. Are you aware of seeing any political</p> <p>18 opinions from any of your coworkers on social</p> <p>19 media?</p> <p>20 A. I don't, don't recall any off the top of</p> <p>21 my head, no.</p> <p>22 Q. I'm not asking you for a specific</p> <p>23 recollection of one, but when, when you're on</p> <p>24 social media, a lot of your social media followers</p> <p>25 or friends, depending on what, what service we're</p>	<p style="text-align: right;">Page 19</p> <p>1 did it on behalf of Southwest or said they were</p> <p>2 doing it on behalf of Southwest or, or not?</p> <p>3 A. I'm sorry, who is they? Like --</p> <p>4 Q. Whoever the employee is that is expressing</p> <p>5 the political opinion.</p> <p>6 A. I'm sorry, I don't understand the</p> <p>7 question.</p> <p>8 Q. Let me rephrase.</p> <p>9 When you're reporting potential</p> <p>10 violations of social media policy based on things</p> <p>11 that come up in, in your social media monitoring,</p> <p>12 do you report those violations whether the</p> <p>13 employee says -- states that they're expressing</p> <p>14 the opinion on behalf of Southwest or whether they</p> <p>15 express it on -- in their own personal capacity?</p> <p>16 A. The company's social media policy allows</p> <p>17 any employee to turn over a potential violation of</p> <p>18 policy for investigation and inquiry. So if there</p> <p>19 were a suspected violation of the policy, that can</p> <p>20 be turned over for investigation.</p> <p>21 Q. Are you aware of any employees who have</p> <p>22 been disciplined for expressing political opinions</p> <p>23 on social media?</p> <p>24 A. No.</p> <p>25 Q. Have you ever received any complaints</p>
<p style="text-align: right;">Page 18</p> <p>1 on, are, are fellow Southwest employees, right?</p> <p>2 A. Some of them are, yes.</p> <p>3 Q. And surely you're seeing political</p> <p>4 opinions all the time from your contacts on social</p> <p>5 media, right?</p> <p>6 MR. MCKEEBY: You asked -- I think</p> <p>7 she's answered that question.</p> <p>8 But go ahead.</p> <p>9 A. I, I honestly don't -- I mean, not that I</p> <p>10 recall. I don't pay that, I don't pay that much</p> <p>11 attention, sorry.</p> <p>12 Q. In what circumstance is a political</p> <p>13 opinion that an employee expresses on social media</p> <p>14 something that you need to refer over to another</p> <p>15 department?</p> <p>16 MR. MCKEEBY: Object to the form of</p> <p>17 the question.</p> <p>18 You can answer.</p> <p>19 A. I think I answered it, which is if the</p> <p>20 team, in, in their reporting of aggregate themes,</p> <p>21 finds a particular use that would be in violation</p> <p>22 or suspected violation of the social media policy,</p> <p>23 they would turn it over via the process in the</p> <p>24 policy for investigation.</p> <p>25 Q. Okay. And does that apply whether they</p>	<p style="text-align: right;">Page 20</p> <p>1 about Charlene Carter for her social media posts?</p> <p>2 A. No.</p> <p>3 Q. Are you aware of any such complaints?</p> <p>4 A. No.</p> <p>5 Q. Have you ever become aware of any of</p> <p>6 Charlene Carter's social media posts at all?</p> <p>7 A. No.</p> <p>8 Q. None of those ever showed up on your</p> <p>9 reports, that you're aware of?</p> <p>10 A. Not that I'm aware of, no.</p> <p>11 Q. So there's nothing that the corporate</p> <p>12 communications department has ever learned about</p> <p>13 Charlene Carter's social media posts that, that</p> <p>14 you felt warranted discipline?</p> <p>15 MR. MCKEEBY: Object to the form. She</p> <p>16 can only answer on behalf of what she knows, not</p> <p>17 what the whole department knows.</p> <p>18 A. I'm unaware if the communications</p> <p>19 department has. I have not.</p> <p>20 Q. I want to talk to you about a situation in</p> <p>21 January of 2017 where there were some lights that</p> <p>22 were, that were turned pink on a Southwest</p> <p>23 Airlines flight. Are you aware of, of that</p> <p>24 occurrence?</p> <p>25 A. Yes, I am.</p>

5 (Pages 17 to 20)

<p style="text-align: right;">Page 21</p> <p>1 Q. Were the -- were those pink lights on a 2 flight that was headed to Washington, D.C. around 3 the time of the Women's March? 4 A. Yes. 5 Q. How did you learn about that? 6 A. Part of our social media reporting 7 illuminated the posts from some passengers who 8 were on board that airplane. 9 Q. And, and how did, how did you -- how did 10 that come to your attention? 11 A. Through our regular social media listening 12 reporting. 13 Q. What was your reaction when you first 14 learned about it? 15 A. The, the -- what I was asked to weigh in 16 on was the conversation that was happening both 17 for and against the action that the flight 18 attendant took. So my reaction was to help 19 Southwest Airlines manage the message about what 20 might have been an implied endorsement of a 21 sponsorship or an involvement in the Women's 22 March. 23 Q. And did Southwest want to avoid such an 24 apparent endorsement? 25 A. Southwest Airlines simply wasn't a sponsor</p>	<p style="text-align: right;">Page 23</p> <p>1 was very -- it was brand-new at the time. 2 Q. I'm going to show you what's been marked 3 as Exhibit 62. 4 (Exhibit 62 marked). 5 Q. And direct you to the second e-mail on 6 Exhibit 62. First of all, it has a To in the, in 7 the, in the heading of the e-mail that says 8 SWACommunicationsTeam-DG (sic). 9 Do you recognize that e-mail group? 10 A. Yes. 11 Q. Are you one of the recipients when an 12 e-mail is to that e-mail group? 13 A. I am not. 14 Q. Who, who does receive that? 15 A. I don't know every member of the 16 distribution group, but the focus is on our 17 external -- our, our, our team members who are 18 responsible for external media response. 19 Q. Scrolling down, do you see the statement 20 that's included in that e-mail? 21 A. Yes. 22 Q. And who is Rachel Barry? 23 A. Rachel Barry is a member of our corporate 24 communications team. 25 Q. And where, where is she in the reporting</p>
<p style="text-align: right;">Page 22</p> <p>1 or an endorser of the event. So it was a matter 2 of correcting the record. 3 Q. And, and you wanted to avoid any 4 impression that Southwest was a -- was an endorser 5 or a sponsor of the event; is that right? 6 A. Well, it would have been incorrect for 7 Southwest Airlines to have been named as a sponsor 8 or an endorser of the event. So we wanted to 9 correct the record. 10 Q. Is there a reason why you wouldn't want to 11 be a sponsor or endorser of the event? 12 A. We, you know, typically do not take public 13 stances on certain political issues, and we had 14 not taken any position politically on the Women's 15 March or what it represented. 16 Q. Do you feel it was inappropriate for 17 employees to change the lighting on a, on a flight 18 in support of the Women's March? 19 A. What we learned was that was a, a new 20 feature that was available to customize the 21 lighting on an airplane, and what we realized was 22 that it was an opportunity to clarify the training 23 for all of our flight attendants to understand 24 when and how it would be appropriate to customize 25 the lighting in the environment in the cabin. It</p>	<p style="text-align: right;">Page 24</p> <p>1 structure? 2 A. She re -- reports to a manager who reports 3 to a director who reports to the managing director 4 who reports to me. 5 Q. Have you ever seen this statement that's 6 in this before? 7 A. Yes. 8 Q. Were you involved in the crafting of that 9 statement? 10 A. Yes, I was. 11 Q. And what was the purpose, in your mind, of 12 this? 13 A. The, the reporting that we captured from 14 our social listening created media interest, and 15 one of the things we wanted to do was be prepared 16 to respond to media inquiries. So we developed 17 this statement in response. 18 Q. Do you consider the, the changing of the 19 light color on the flight to be a violation of 20 Southwest policies? 21 MR. MCKEEBY: Objection to the form of 22 the question. 23 You can answer. 24 A. Can you say that again? 25 Q. When the flight attendants changed the,</p>

Linda Rutherford

Page 25	Page 27
<p>1 changed the color of the lighting on that flight, 2 do you consider that to be a violation of 3 Southwest policies? 4 MR. MCKEEBY: Same objection. 5 A. I, I can't speak to the flight attendant 6 manual which would direct how and when they are 7 supposed to change the lights. I can only speak 8 to the photo and the resulting narrative and 9 conversation that developed as a result of the 10 photo. 11 Q. And, and, and you viewed the, the, the 12 net, the net effect of that photo to be a negative 13 one, right? 14 A. The net effect of the narrative that 15 resulted of the photo was a misunderstanding about 16 whether Southwest Airlines was sponsoring or 17 endorsing the Women's March in Washington, D.C. 18 Q. Are you aware of any employees that were 19 disciplined for creating that misperception? 20 A. I'm not aware. 21 Q. But to be clear, South -- Southwest's 22 communication team disapproved of shows like the 23 changing of the colors of lights, right? 24 MR. MCKEEBY: Object to the form. 25 But you can answer.</p>	<p>1 Q. Do you know who he consulted? 2 A. The, the departments work with 3 communicators on the communi -- corporate 4 communications team to help, you know, develop 5 communications such as this. 6 Q. Okay. 7 (Mr. Greenfield enters room). 8 Q. Would you agree with me that the overall 9 message from this statement is, is to avoid 10 sharing -- is to avoid engaging customers with 11 political opinions? 12 MR. MCKEEBY: Object to form. The 13 document speaks for itself. 14 But you can answer as to how you 15 interpret it. 16 A. My interpretation of this message is that 17 we are encouraging our flight attendants to be 18 welcoming of all customers onboard our planes. 19 Q. And to avoid sharing political opinions 20 with them, right? 21 A. To understand that raising political views 22 can be polarizing onboard the airplane. 23 Q. I'm going to show you what I'm marking as 24 Exhibit 169 -- I'm sorry, 139. 25 (Exhibit 139 marked).</p>
Page 26	Page 28
<p>1 A. The, the communications department does 2 not approve or disapprove. It manages what the 3 outcome is. And so in this instance, the photo 4 created conversation, and we needed to manage the 5 narrative around the conversation that, that came 6 as a result of the photo being shared on social 7 channels. 8 Q. I want to direct your attention to 9 Exhibit 37. And I'll put it up on the screen for 10 you. 11 (Exhibit 37 marked). 12 Q. Do you recognize Exhibit 37? 13 A. I recognize Inflight Info on the Go as 14 being a communications channel internal to the 15 flight attendant group. 16 Q. Do you recognize the statement that's 17 included in Exhibit 37? 18 A. I know, I know it was, I know it was a 19 statement that was shared with flight attendants. 20 Q. Were you involved in the creation of this 21 statement? 22 A. I was not. 23 Q. Did Mr. Sims consult you at all about this 24 statement? 25 A. Not me personally, no.</p>	<p>1 (Discussion off the record). 2 MR. HILL: Let's go off the record for 3 a second. 4 (Recess). 5 THE REPORTER: Back on the record. 6 Q. Ms. Rutherford, have you ever seen 7 Exhibit 139 before? 8 A. Yes. 9 Q. What is it? 10 A. It is the regular reporting from the 11 corporate listening efforts. 12 Q. These are, these are the reports about 13 what's happening on social media that you were 14 talking about that you received, right? 15 A. That's correct. 16 Q. This particular tweet is from Planned 17 Parenthood. And it says: Thanks, Southwest 18 Airlines, for getting Planned Parenthood's 19 supporters to the Women's March -- Southwest's 20 supporters and -- I'm sorry, let me start that 21 over. 22 Planned Parenthood's tweet says: 23 Thanks, SouthwestAir, for getting Planned 24 Parenthood's supporters and Women's Marchers to 25 D.C. this weekend.</p>

7 (Pages 25 to 28)

Page 29

1 And it contains a picture and a link;
2 is that, is that accurate?
3 A. Yes.
4 Q. Did you have any communication with
5 Planned Parenthood about the Women's March?
6 A. We did not.
7 Q. Were you aware of anyone at Southwest
8 having any communications with Planned Parenthood
9 about the Women's March?
10 A. No.
11 Q. Was the first time you became aware of
12 this Planned Parenthood tweet when you received
13 this Hot Topics report?
14 A. Yes.
15 Q. Did you, did you have any contact with
16 Planned Parenthood thereafter?
17 A. No.
18 Q. Are you aware of anyone at Southwest that
19 had any contact with Planned Parenthood
20 thereafter?
21 A. No.
22 Q. What was your reaction to this, to this
23 tweet?
24 A. The full report shows the mix of
25 conversation, and as I mentioned previously,

Page 30

1 because there was mixed sentiment and confusion
2 about implied endorsement, it really became
3 something that we needed to clarify, that we had
4 not taken a public position or a political
5 position on the Women's March in D.C.
6 Q. If Southwest employees were associating
7 themselves with the Women's March in D.C., would
8 that be problematic for Southwest?
9 MR. MCKEEBY: Object to the form of
10 the question.
11 You can answer.
12 A. It -- I mean, your, your question is a
13 hypothetical one. It depends.
14 Q. So if employ -- well, let's -- if you
15 became aware that an employee was wearing clothes
16 or carrying signs that identified them with
17 Southwest at the Women's March, would that be
18 problematic for Southwest?
19 MR. MCKEEBY: Same objection as to
20 form. Hypothetical.
21 You can answer.
22 A. It would, it would depend on whether the
23 portrayal of that information was a violation of
24 company policy.
25 Q. But Southwest wanted to avoid being viewed

Page 31

1 as supporting the Women's March, right?
2 A. Southwest wanted to make it clear that it
3 had not taken a position one way or another about
4 the purpose or the events around the Women's
5 March.
6 Q. Right. And so anything that implied
7 otherwise, that Southwest was taking a position
8 one way or the other on the Women's March, would
9 be a problem, wouldn't it?
10 MR. MCKEEBY: Object to the form.
11 Again, it's hypothetical.
12 You can answer.
13 A. Yeah, it -- again, it de -- it depends.
14 It depends on what the nexus was, if it was
15 disruptive to our operation, there are a number of
16 circumstances.
17 Q. Okay. You would -- if someone came to you
18 for approval to use the Southwest logo in
19 connection with their participation in the Women's
20 March, would you approve that?
21 MR. MCKEEBY: Same objection.
22 You can answer.
23 A. So our, our -- that would not be my
24 explicit approval. That's not my responsibility.
25 If, if asked, we would take a look at whether we

Page 32

1 were sponsoring the event and, and, again, what
2 the nexus was to our airline before we would
3 approve the use of a company logo.
4 Q. If somebody used that company logo without
5 permission, that would be a problem, wouldn't it?
6 MR. MCKEEBY: Object to the form.
7 Again, hypothetical.
8 You can answer as best you can.
9 A. Not my responsibility. That -- that's a
10 responsibility of another development.
11 Q. Are you aware of any, of any department at
12 Southwest Airlines taking action against anyone
13 for using Southwest logos at the Women's March?
14 A. No.
15 Q. But it's inconsistent with the message
16 that you want to present, right?
17 MR. MCKEEBY: Again, object, she's
18 asked and answered.
19 But go ahead, you can answer again.
20 A. Yeah, I, I would mostly be concerned if
21 there was an action we needed to take due to a
22 company policy violation.
23 Q. What do you know about the company --
24 about Southwest's comp -- social media policy?
25 A. The communications team and the legal team

<p style="text-align: right;">Page 33</p> <p>1 work together to initially develop the policy and</p> <p>2 then --</p> <p>3 (Court reporter clarification).</p> <p>4 A. The communications team and the legal team</p> <p>5 work together to initially develop the policy and</p> <p>6 then they do a regular evaluation of the policy to</p> <p>7 make sure that it's -- you know, stayed current.</p> <p>8 I'm, I'm aware of that policy. I don't know every</p> <p>9 word in it.</p> <p>10 Q. Were you, were you part of the</p> <p>11 communications team that was involved in the</p> <p>12 creation of that policy?</p> <p>13 A. That team reported to me at the time.</p> <p>14 Q. Did you sign off on the social media</p> <p>15 policy?</p> <p>16 A. The communications department as a whole</p> <p>17 and the legal department as a whole signed off on</p> <p>18 that policy.</p> <p>19 Q. Did you personally sign off on the policy,</p> <p>20 though?</p> <p>21 A. No.</p> <p>22 Q. Okay. I'm going to show you what's been</p> <p>23 marked as Exhibit 9.</p> <p>24 (Exhibit 9 marked).</p> <p>25 Q. Do you recognize Exhibit 9?</p>	<p style="text-align: right;">Page 35</p> <p>1 materials, right?</p> <p>2 A. Yes.</p> <p>3 Q. Did Southwest have a problem with</p> <p>4 employees posting on social media where, where</p> <p>5 they were wearing their Southwest uniforms?</p> <p>6 A. It, it --</p> <p>7 MR. MCKEEBY: I'm sorry, I'm trying to</p> <p>8 process the question. I'll, I'll object to the</p> <p>9 form as -- well, I'll object to the form.</p> <p>10 And you can answer</p> <p>11 A. It depends.</p> <p>12 Q. Okay. In and of itself, an employee</p> <p>13 taking a picture or posting a picture of</p> <p>14 themselves in their Southwest uniform, is there</p> <p>15 anything that violates the policy just in that?</p> <p>16 A. It would depend on the photo.</p> <p>17 Q. Okay. So unless there's some other</p> <p>18 violation in the photo, there's no, there's no</p> <p>19 violation in this, right?</p> <p>20 A. Again, there's, there's a lot of different</p> <p>21 ways in which the material could be presented. So</p> <p>22 it would depend, it would depend on the use.</p> <p>23 Q. I, I just want to be clear. You're saying</p> <p>24 that it might be a violation of Southwest's social</p> <p>25 media policy for an employee to post a picture of</p>
<p style="text-align: right;">Page 34</p> <p>1 A. Yes.</p> <p>2 Q. What is Exhibit 9?</p> <p>3 A. It looks like the 2016 version of the</p> <p>4 social media policy.</p> <p>5 Q. And would you consider it to be a</p> <p>6 violation of this policy for an employee to post</p> <p>7 their own political opinions on social media?</p> <p>8 MR. MCKEEBY: Objection to the form of</p> <p>9 the question as hypothetical.</p> <p>10 You can answer.</p> <p>11 A. It, it depends.</p> <p>12 Q. What parts of this policy might that</p> <p>13 implicate?</p> <p>14 MR. MCKEEBY: What, what im -- might</p> <p>15 what implicate?</p> <p>16 Q. Expre -- the expression of a political</p> <p>17 opinion on social media by a Southwest employee.</p> <p>18 A. The, the policy -- yeah, the policy lists</p> <p>19 the prohibitive behavior. So if there was a piece</p> <p>20 of content that was against the policy, it would</p> <p>21 be investigated.</p> <p>22 Q. And one of the things it mentions on here</p> <p>23 is: Unauthorized use of Southwest's logo,</p> <p>24 trademarks, image, video, text, graphics, or other</p> <p>25 Southwest owned or operated -- or copyrighted</p>	<p style="text-align: right;">Page 36</p> <p>1 themselves in their Southwest uniform?</p> <p>2 A. It depends on what the employee in the</p> <p>3 Southwest uniform was doing in the photo. So it</p> <p>4 depends.</p> <p>5 Q. Okay. If they're not doing anything,</p> <p>6 there's no other violation, all they're doing is</p> <p>7 wearing a Southwest uniform, there's no violation</p> <p>8 there, right?</p> <p>9 A. It, it, it depends. If, if a Southwest</p> <p>10 Airlines employee was in uniform but they were in</p> <p>11 a secure area without proper personal protection</p> <p>12 equipment, as an example, that would be a</p> <p>13 violation of company policy. So it -- I can't --</p> <p>14 you're asking me to speak in absolute, and it</p> <p>15 depends.</p> <p>16 Q. Well, right. So if they're violating a</p> <p>17 policy and they're wearing a Southwest uniform,</p> <p>18 that's a problem; if they're just wearing a</p> <p>19 Southwest uniform, that's not a problem, though,</p> <p>20 right?</p> <p>21 A. It would, it would, it would depend on the</p> <p>22 image.</p> <p>23 Q. Okay. So you're -- are you aware of any</p> <p>24 of your Facebook friends ever posting pictures of</p> <p>25 themselves in their Southwest uniforms on social</p>

<p style="text-align: right;">Page 37</p> <p>1 media?</p> <p>2 A. Yes.</p> <p>3 Q. Did you consider any of those to be --</p> <p>4 have, have you ever considered any of those to be</p> <p>5 a violation?</p> <p>6 MR. MCKEEBY: Of this policy?</p> <p>7 MR. HILL: That's right.</p> <p>8 A. I haven't, I haven't seen every single</p> <p>9 posting. Of the postings I have seen, I have not</p> <p>10 seen anything that was a violation of the policy.</p> <p>11 Q. So you've seen numerous posts of employees</p> <p>12 in their Southwest uniforms that you did not</p> <p>13 consider to be a violation of this policy; is that</p> <p>14 right?</p> <p>15 A. That's correct.</p> <p>16 Q. Have you also seen numerous posts by your,</p> <p>17 by your social media contacts that identified</p> <p>18 themselves as Southwest employees that you did not</p> <p>19 consider to be a violation of this policy?</p> <p>20 MR. MCKEEBY: Other than through their</p> <p>21 wearing a uniform?</p> <p>22 MR. HILL: This is -- yeah, I mean,</p> <p>23 this is a separate question from the uniform</p> <p>24 question.</p> <p>25 Q. This is them saying, you know, I'm, I'm</p>	<p style="text-align: right;">Page 39</p> <p>1 any disagreement on those social channels.</p> <p>2 Q. If you learned -- if someone -- if, if a</p> <p>3 Southwest employee came to you and said that they</p> <p>4 had been discriminated against because of their</p> <p>5 religion, what would you do?</p> <p>6 A. So someone is, is claiming that their --</p> <p>7 can you repeat the question? I'm sorry.</p> <p>8 Q. If someone told you that they had been</p> <p>9 discriminated against because of their religion,</p> <p>10 what would you do?</p> <p>11 A. Well, as a, as a leader, I would have a</p> <p>12 responsibility to report the allegation and make</p> <p>13 sure that it was invested -- or investigated by</p> <p>14 the appropriate teams.</p> <p>15 Q. Who is that? Who would you report it to?</p> <p>16 A. I would report it to employee relations.</p> <p>17 Q. Anyone else?</p> <p>18 A. No.</p> <p>19 Q. Do you know what the accommodations and</p> <p>20 career transition team is?</p> <p>21 (Court reporter clarification).</p> <p>22 A. Yes.</p> <p>23 Q. Who are they?</p> <p>24 A. I don't know everyone on that team.</p> <p>25 Q. What are they? What do they do?</p>
<p style="text-align: right;">Page 38</p> <p>1 proud to be a Southwest flight attendant, or I was</p> <p>2 on my Southwest flight the other day, something</p> <p>3 that identifies them as being a Southwest</p> <p>4 employee. There's nothing in and of itself that</p> <p>5 violates the social media policy in that, right?</p> <p>6 A. In my personal feed that I have been aware</p> <p>7 of, no.</p> <p>8 Q. Are you aware of anyone being disciplined</p> <p>9 for identifying themselves as a Southwest employee</p> <p>10 on their social media feed?</p> <p>11 A. For, for -- that's the only action, is --</p> <p>12 Q. That's right.</p> <p>13 A. -- identifying themselves as, as an</p> <p>14 employee?</p> <p>15 Q. Right.</p> <p>16 A. No, I'm not aware of that.</p> <p>17 Q. Have you ever posted anything on social</p> <p>18 media that someone might disagree with?</p> <p>19 MR. MCKEEBY: Object to the form of</p> <p>20 the question.</p> <p>21 You can answer.</p> <p>22 A. Not to my knowledge.</p> <p>23 Q. Everything you've ever posted on social</p> <p>24 media is something that's universally agreeable?</p> <p>25 A. I, I didn't say that. I'm not aware of</p>	<p style="text-align: right;">Page 40</p> <p>1 A. They help employees who either need an</p> <p>2 accommodation for light duty, so, in other words,</p> <p>3 they have a job and they need to --</p> <p>4 (Court reporter clarification).</p> <p>5 A. They help employees who either need an</p> <p>6 accommodation for light duty, to do a different</p> <p>7 job for a period of time, could be they're coming</p> <p>8 back from a medical release. Career transitions</p> <p>9 is to help someone in -- a Southwest Airlines</p> <p>10 employee internally who might be looking for a</p> <p>11 different career path within the company.</p> <p>12 Q. Are they also known as ACT?</p> <p>13 A. I don't know the acronym. Sorry. But</p> <p>14 that's not what I call them.</p> <p>15 Q. Are you aware of any role that they have</p> <p>16 in dealing with religion?</p> <p>17 A. I, I know that in the last series of</p> <p>18 vaccines, that the team was helpful in making sure</p> <p>19 that we had the appropriate documentation for</p> <p>20 employees, if they needed a religious</p> <p>21 accommodation from getting a vaccine.</p> <p>22 Q. But if someone said that they, that they</p> <p>23 were discriminated against because of their</p> <p>24 religion, you wouldn't have, you wouldn't have</p> <p>25 thought to refer that person to the accommodations</p>

Page 41	Page 43
<p>1 and career transitions team, right?</p> <p>2 A. No, I would first ensure that the</p> <p>3 allegation was properly vetted.</p> <p>4 Q. What did you do to prepare for this</p> <p>5 deposition?</p> <p>6 A. Had time with counsel.</p> <p>7 Q. Who did you meet with?</p> <p>8 A. Paulo and, and Chris and Kerrie.</p> <p>9 Q. What documents did you review in</p> <p>10 preparation for this deposition?</p> <p>11 A. The, the two discovery items that you</p> <p>12 popped on the screen related to the media</p> <p>13 statement and also the, the pink lighting of the</p> <p>14 airplane.</p> <p>15 Q. Anything else?</p> <p>16 A. The, the statement from the internal</p> <p>17 Inflight from Mike Sims.</p> <p>18 Q. Okay. Anything else?</p> <p>19 A. That's all.</p> <p>20 MR. HILL: I want to take a short</p> <p>21 break, and then we'll come back and hopefully end</p> <p>22 pretty quickly.</p> <p>23 Off the record.</p> <p>24 THE REPORTER: Off the record.</p> <p>25 (Recess).</p>	<p>1 A. On my personal feed?</p> <p>2 Q. Yes. That you were a -- you -- you've</p> <p>3 seen employees in their Southwest uniform --</p> <p>4 A. I've seen employees in Southwest uniform.</p> <p>5 Q. Are you aware of any employees being</p> <p>6 disciplined for being in Southwest uniform and in</p> <p>7 combination with, with something else on their</p> <p>8 social media feed?</p> <p>9 A. I'm sorry, I don't understand the</p> <p>10 question.</p> <p>11 Q. Okay. So what you told me before is</p> <p>12 you're not aware of anyone being disciplined for</p> <p>13 appearing in a Southwest uniform or identifying</p> <p>14 themselves as a Southwest employee on their, on</p> <p>15 their feed, right?</p> <p>16 A. Yes.</p> <p>17 Q. Are you aware of anyone being disciplined</p> <p>18 for appearing as a Southwest employee and doing</p> <p>19 something else that's inappropriate on their feed?</p> <p>20 A. Yes, I do know there have been violations</p> <p>21 of, of the, the company policy, yes.</p> <p>22 Q. Can you tell me about what violations</p> <p>23 you're aware of?</p> <p>24 A. I'm, I'm aware of conduct violations. I'm</p> <p>25 aware of ethics violations. I'm aware of social</p>
Page 42	Page 44
<p>1 THE REPORTER: Back on the record.</p> <p>2 Q. Ms. Rutherford, we've just taken a break.</p> <p>3 During the break, did you have any conversations</p> <p>4 with anyone?</p> <p>5 A. Yes, I spoke to attorney Paulo.</p> <p>6 Q. What did you discuss?</p> <p>7 MR. MCKEEBY: She's, she's not going</p> <p>8 to tell you that. That's attorney-client</p> <p>9 privilege.</p> <p>10 MR. HILL: She, she should. She's</p> <p>11 required to because it's a conversation that</p> <p>12 happens during the pendency of a deposition.</p> <p>13 MR. MCKEEBY: No, she's not. She's</p> <p>14 instructed not to answer.</p> <p>15 MR. HILL: Okay.</p> <p>16 Q. Was anyone disciplined for being -- okay.</p> <p>17 So we talked earlier about people that were</p> <p>18 identifying themselves either through their attire</p> <p>19 or otherwise as being Southwest employees on</p> <p>20 social media, right?</p> <p>21 A. I don't understand the question.</p> <p>22 Q. You're aware that we had a discussion</p> <p>23 about employees who revealed themselves to be</p> <p>24 Southwest employees, either their uniform or</p> <p>25 otherwise, on social media, right?</p>	<p>1 media policy violations. I'm aware of prohibitive</p> <p>2 behavior violations.</p> <p>3 Q. And for these -- okay. So for three these</p> <p>4 violations, need the person have -- be associated</p> <p>5 with Southwest in some way on their, on their</p> <p>6 feed?</p> <p>7 A. The, the policy states that there's a</p> <p>8 nexus that they are being identified as a</p> <p>9 Southwest Airlines employee.</p> <p>10 Q. And how close does that nexus have to be?</p> <p>11 A. Depends on the situation.</p> <p>12 Q. Okay. If -- is, is it, is it your</p> <p>13 understanding that a person would be in violation</p> <p>14 of that policy if, for example, on the, on the</p> <p>15 part of your Facebook that says what, what you do</p> <p>16 for a living it says I work at Southwest, and then</p> <p>17 they happen to say something that, that you view</p> <p>18 as a violation of the policy elsewhere in, in the</p> <p>19 Facebook page?</p> <p>20 MR. MCKEEBY: Objection to the form of</p> <p>21 the question. It's a hypothetical.</p> <p>22 You can answer.</p> <p>23 A. It, it would, it would depend on, on what</p> <p>24 was said and if it was in violation of company</p> <p>25 policy, if they've identified themselves as a</p>

<p style="text-align: right;">Page 45</p> <p>1 Southwest Airlines employee. 2 Q. Okay. In terms of expressing political 3 opinions that Southwest would rather not be 4 associated with, is that, is that a problem if 5 they've identified themselves as a Southwest 6 employee? 7 MR. MCKEEBY: Again, same objection. 8 You can answer. 9 A. It, it, it depends on the content of, of 10 the post. 11 Q. Earlier when you talked about the 12 listening center, you said that there are multiple 13 stakeholders. Who are those? 14 A. The, the, the distri -- distribution group 15 is multiple departments. I don't know them all, 16 but it's multiple departments across the company 17 that receive that. 18 Q. Let me make the ques -- question clear. 19 You said that there are multiple stakeholders that 20 are being monitored at the listening center. Who 21 are those stakeholders? 22 MR. MCKEEBY: I'm not sure that's that 23 clear. 24 But go ahead. 25 A. Yeah, the, the listening center attempts</p>	<p style="text-align: right;">Page 47</p> <p>1 You can answer. 2 A. It depends on the, depends on the 3 conversation. 4 Q. Do you have a global objective? 5 A. The global objective is to create affinity 6 for our brand with our multiple stakeholders, so 7 as a great place to work, as a great airline to 8 fly, as a good community citizen, as a generous 9 corporate entity. 10 Q. Earlier you talked about Southwest's voice 11 on social media. What is Southwest's voice? 12 A. It's the same. So it's intended to be an 13 extension of our personality that our employees 14 deliver each and every day in the execution of the 15 operation and for our customers, predominantly, to 16 see that same personality in social media. 17 Q. With respect to the pink lights for the 18 Women's March, did you have any conversations with 19 Audrey Stone about those pink lights? 20 A. I did not. 21 Q. How about with Naomi Hudson? 22 A. I did not. 23 Q. Sonya Lacore? 24 A. I talked to Sonya. 25 Q. What did you discuss with Sonya Lacore</p>
<p style="text-align: right;">Page 46</p> <p>1 to look at what customers and, and entities within 2 our industry, such as the Air Transport, Airlines 3 for America, our industry association. There are 4 different ways to monitor for conversations. So 5 those multiple stakeholders can be monitored for, 6 for conversation that's happening across the 7 industry. 8 Q. But who are the -- what, what stakeholder 9 groups are you, are you trying to listen to? 10 A. Predominantly customers. 11 Q. Any others? 12 A. As I mentioned, industry groups. We also 13 monitor media. 14 Q. What is your -- any others? 15 A. No, those are, those are the main ones. 16 Q. What is your home address? 17 A. 1714 Pecan Grove, Carrollton, Texas 75007. 18 Q. When you talked earlier about managing the 19 conversation, what are the objectives of managing 20 that conversation? 21 MR. MCKEEBY: What conversation? 22 Object to form. 23 MR. HILL: The conversation on social 24 media. 25 MR. MCKEEBY: Same objection.</p>	<p style="text-align: right;">Page 48</p> <p>1 about that situation? 2 A. It was to create her awareness about the 3 fact that the, the picture had been shared on 4 social media and that a conversation was brewing 5 that implied endorsement of the event in 6 Washington, D.C., and that it had now entered the 7 public discourse. So it would be something that 8 the communications team would need to manage. 9 Q. Who is Sonya Lacore? 10 A. Sonya Lacore is our vice president of 11 inflight. 12 Q. And what is her responsibility? 13 A. Her responsibility is for the, the entire 14 population of flight attendants at Southwest 15 Airlines. 16 Q. And you had this conversation with her 17 because you needed her help in addressing this 18 problem, right? 19 A. I needed her awareness because it raised a 20 training opportunity, because this lighting 21 capability was so new to Southwest Airlines, it 22 was an opportunity to make sure that all of our 23 flight attendants understood the capability and 24 then how we wanted them to use it to help create 25 the right brand environment.</p>

12 (Pages 45 to 48)

<p>Page 49</p> <p>1 Q. Do you know Audrey Stone?</p> <p>2 A. Yes.</p> <p>3 Q. Do you communicate regularly with Audrey</p> <p>4 Stone?</p> <p>5 A. I do not.</p> <p>6 Q. When, when did you last talk to her?</p> <p>7 A. Two or three years ago.</p> <p>8 Q. Did you regularly communicate with her</p> <p>9 during the, during the period of January 2017?</p> <p>10 A. No.</p> <p>11 Q. Did you ever communicate with --</p> <p>12 MR. MCKEEBY: Matt, are we close to</p> <p>13 wrapping up? We're about at our time limit.</p> <p>14 MR. HILL: We are.</p> <p>15 Q. Did you ever communicate with her --</p> <p>16 MR. MCKEEBY: Well, wait a minute. I</p> <p>17 -- you've made -- you've noted that we are, but</p> <p>18 you didn't respond to my question. Are you close</p> <p>19 to wrapping up?</p> <p>20 MR. HILL: That was, that was an</p> <p>21 answer to both questions; we are close to wrapping</p> <p>22 up and we are close to our time period.</p> <p>23 MR. MCKEEBY: All right. We're</p> <p>24 getting real close.</p> <p>25 MR. HILL: Yeah.</p>	<p>Page 51</p> <p>1 THE REPORTER: Okay. And do you want</p> <p>2 to purchase a copy, Mr. McKeeby? Or anyone else</p> <p>3 want to purchase a copy?</p> <p>4 MR. MCKEEBY: I would like to purchase</p> <p>5 a condensed version only.</p> <p>6 MR. CLOUTMAN: TWU Local 556 would</p> <p>7 like the same as Southwest, a condensed copy only.</p> <p>8 THE REPORTER: Okay. We are going off</p> <p>9 the record at 1:06 p.m.</p> <p>10 (Deposition concluded at 1:06 p.m.)</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p>Page 50</p> <p>1 Q. Did you ever have any con --</p> <p>2 communications with Ms. Stone about the Women's</p> <p>3 March?</p> <p>4 A. No.</p> <p>5 MR. HILL: I don't have any further</p> <p>6 questions.</p> <p>7 MR. MCKEEBY: I do not have any</p> <p>8 questions.</p> <p>9 THE REPORTER: Okay. Are there any</p> <p>10 other housekeeping matters before we close out the</p> <p>11 record?</p> <p>12 MR. CLOUTMAN: Yes, I wanted to</p> <p>13 indicate that TWU Local 556 has no questions.</p> <p>14 MR. MCKEEBY: No other housekeeping</p> <p>15 measures, at least from me.</p> <p>16 MR. HILL: None from us.</p> <p>17 MR. MCKEEBY: Thank you, Ms.</p> <p>18 Rutherford.</p> <p>19 THE REPORTER: Okay. What about</p> <p>20 signature?</p> <p>21 MR. MCKEEBY: We haven't talked about</p> <p>22 that.</p> <p>23 THE REPORTER: Read and sign or waive?</p> <p>24 MR. MCKEEBY: Yeah, send it to me for</p> <p>25 read and sign.</p>	<p>Page 52</p> <p>1 CHANGES AND SIGNATURE</p> <p>2 WITNESS NAME: LINDA RUTHERFORD</p> <p>3 DATE: JUNE 23, 2022</p> <p>4 PAGELINE CHANGE REASON</p> <p>5 _____</p> <p>6 _____</p> <p>7 _____</p> <p>8 _____</p> <p>9 _____</p> <p>10 _____</p> <p>11 _____</p> <p>12 _____</p> <p>13 _____</p> <p>14 _____</p> <p>15 _____</p> <p>16 _____</p> <p>17 _____</p> <p>18 _____</p> <p>19 _____</p> <p>20 _____</p> <p>21 _____</p> <p>22 _____</p> <p>23 _____</p> <p>24 _____</p> <p>25 _____</p>

Page 53

1 _____
2 _____
3 _____
4 I, LINDA RUTHERFORD, have read the
5 foregoing deposition and hereby affix my signature
6 that same is true and correct, except as noted
7 above.
8
9
10
11
12 _____
13 LINDA RUTHERFORD
14
15
16 THE STATE OF _____
17 COUNTY OF _____
18
19 Before me, _____, on
20 this day personally appeared LINDA RUTHERFORD,
21 known to me (or proved to me under oath or through
22 _____) (description of
23 identity card or other document)) to be the person
24 whose name is subscribed to the foregoing
25 instrument and acknowledged to me that they

Page 54

1 executed the same for the purposes and
2 consideration therein expressed.
3 Given under my hand and seal of office
4 this _____ day of _____,
5 _____.
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9 _____
10 NOTARY PUBLIC IN AND FOR
11 THE STATE OF _____
12 COMMISSION EXPIRES: _____
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Page 55

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF TEXAS
3 DALLAS DIVISION
4 CHARLENE CARTER,)
5)
6 Plaintiff,)
7)
8 VS.) CIVIL ACTION
9)
10) NO.: 3:17-cv-02278-X
11 SOUTHWEST AIRLINES CO.,)
12 AND TRANSPORT WORKERS)
13 UNION OF AMERICA, LOCAL)
14 556,)
15)
16 Defendants.)
17
18 REPORTER'S CERTIFICATION
19 DEPOSITION OF LINDA RUTHERFORD
20 JUNE 23, 2022
21
22 I, Melody A. Monk, Certified Shorthand
23 Reporter in and for the State of Texas, hereby
24 certify to the following:
25 That the witness, LINDA RUTHERFORD, was duly
sworn by the officer and that the transcript of
the oral deposition is a true record of the
testimony given by the witness;
That the deposition transcript was submitted
on June 29, 2022 to the witness or to the attorney
for the witness for examination, signature and
return to me by July 29, 2022;

Page 56

1 That the amount of time used by each party at
2 the deposition is as follows:
3 MATTHEW D. HILL.....00 HOUR(S):54 MINUTE(S)
4 That pursuant to information given to the
5 deposition officer at the time said testimony was
6 taken, the following includes counsel for all
7 parties of record:
8
9 FOR THE PLAINTIFF:
10 MATTHEW D. HILL
11 Pryor & Bruce
12 302 North San Jacinto
13 Rockwall, Texas 75087
14 972.771.3933
15 Mhill@pryorandbruce.com
16
17 MATTHEW B. GILLIAM
18 National Right to Work Legal Defense
19 Foundation, Inc.
20 8001 Braddock Road
21 Suite 600
22 Springfield, Virginia 22160
23 703.321.8510
24 Mbg@nrtw.org
25
26 FOR THE DEFENDANT Southwest Airlines CO.:
27 PAULO B. MCKEEBY
28 Reed Smith
29 2850 North Harwood Street
30 Suite 1500
31 Dallas, Texas 75201
32 Pmckeeby@reedsmith.com
33
34
35

Page 57

1 FOR THE DEFENDANT TRANSPORT WORKERS UNION OF
2 AMERICA LOCAL 556:

3 EDWARD B. CLOUTMAN, III
4 Law Offices of Edward Cloutman III
5 3301 Elm Street
6 Dallas, Texas 75226
7 214.232.9015
8 Ecloutman@lawoffices.email

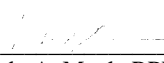
9 ADAM S. GREENFIELD
10 Cloutman & Greenfield, PLLC
11 3301 Elm Street
12 Dallas, Texas 75226
13 Agreenfield@candlelegal.com

14 That \$_____ is the deposition officer's
15 charges to the Plaintiff for preparing the
16 original deposition transcript and any copies of
17 exhibits;

18 I further certify that I am neither counsel
19 for, related to, nor employed by any of the
20 parties or attorneys in the action in which this
21 proceeding was taken, and further that I am not
22 financially or otherwise interested in the outcome
23 of the action.

24 Certified to by me this 24th day of June,
25 2022.

Page 58

1
2 
3 Melody A. Monk, RPR
4 Texas CSR No. 3613
5 Expiration Date: 10/21/2022



6 MELODY MONK REPORTING
7 Firm Registration No. 10821
8 1999 McKinney Avenue, No. 1404
9 Dallas, Texas 75201
10 888.988.5317 (phone and fax)

15 (Pages 57 to 58)

MELODY MONK REPORTING
888.988.5317

A	20:23 21:19,25 22:7 25:16 28:18 32:12 36:10 40:9 44:9 45:1 46:2 48:15,21 55:6 56:19	area 36:11 Armstrong 4:8 asked 18:6 21:15 31:25 32:18 asking 17:22 36:14 Associate 4:7 associated 16:8 44:4 45:4 associating 30:6 association 46:3 attached 2:3 attaches 13:8 attempts 45:25 attendant 21:18 25:5 26:15 38:1 attendants 22:23 24:25 26:19 27:17 48:14,23 attention 12:7 18:11 21:10 26:8 attire 42:18 attorney 4:6 42:5 55:23 attorney-client 42:8 attorneys 57:17 Audrey 47:19 49:1,3 available 22:20 Avenue 58:6 avoid 21:23 22:3 27:9,10,19 30:25 aware 14:16,23 15:7 17:17 19:21 20:3,5,9 20:10,23 25:18 25:20 29:7,11 29:18 30:15 32:11 33:8 36:23 38:6,8	38:16,25 40:15 42:22 43:5,12 43:17,23,24,25 43:25 44:1 awareness 48:2 48:19	capacity 19:15 captured 24:13 captures 14:9 card 53:23 career 39:20 40:8,11 41:1 Carrollton 46:17 carrying 30:16 Carter 1:3 4:5 6:3,14 20:1 55:3 Carter's 20:6,13 case 6:2,5,21 cause 1:21 center 14:8 45:12,20,25 certain 15:24 22:13 Certificate 5:7 CERTIFICA... 55:11 Certified 55:15 57:21 certify 55:17 57:15 change 22:17 25:7 52:4 changed 24:25 25:1 CHANGES 52:1 changing 24:18 25:23 channel 16:4 26:14 channels 8:21 9:6,13 10:9 11:6 26:7 39:1 charge 17:5 charges 57:12 Charlene 1:3 4:5 6:3,14 20:1 20:6,13 55:3 Chris 4:6 41:8 circumstance
above-styled 1:21 absolute 36:14 accommodation 40:2,6,21 accommodati... 39:19 40:25 accurate 29:2 acknowledged 53:25 acronym 40:13 ACT 40:12 action 1:5 21:17 32:12,21 38:11 55:5 57:17,20 activities 5:12 10:17 ADAM 4:1 57:6 address 1:25 13:4,5 46:16 addressing 48:17 affinity 47:5 affix 53:5 affordably 16:13 aggregate 14:10 18:20 ago 9:6 49:7 agree 27:8 agreeable 38:24 agreements 6:16 Agreenfield@ ... 4:3 57:8 ahead 18:8 32:19 45:24 Air 46:2 airline 12:5 16:13 32:2 47:7 Airlines 1:6 3:14 4:6,7,8 5:13 6:3,10 7:8 8:2 9:12 10:7 12:5	Airlines' 9:5 airplane 21:8 22:21 27:22 41:14 allegation 39:12 41:3 allows 19:16 America 1:7 3:21 6:4 46:3 55:7 57:1 amount 56:1 answer 9:21 11:16,23 15:22 18:18 20:16 24:23 25:25 27:14 30:11,21 31:12,22 32:8 32:19 34:10 35:10 38:21 42:14 44:22 45:8 47:1 49:21 answered 14:3 18:7,19 32:18 anyway 14:3 apparent 21:24 appearances 5:2 6:8 appeared 53:20 appearing 3:2 6:9 43:13,18 apply 18:25 appropriate 22:24 39:14 40:19 approval 31:18 31:24 approve 26:2 31:20 32:3	B B 3:8,15,22 56:13,20 57:2 back 8:5 11:25 28:5 40:8 41:21 42:1 Barnett 8:9 Barry 23:22,23 based 19:10 basis 10:16 13:21 behalf 6:10,11 6:14 19:1,2,14 20:16 behavior 34:19 44:2 best 32:8 better 10:1 board 21:8 Braddock 3:10 56:15 brand 47:6 48:25 brand-new 23:1 break 41:21 42:2,3 brewing 48:4 broadly 15:11 Bruce 3:5 56:10 business 8:19,25 9:1 10:8 16:20	C C 3:1 cabin 13:11 22:25 call 40:14 capability 48:21 48:23	

18:12 circumstances 31:16 citizen 47:8 Civil 1:5 2:1 6:5 55:5 claiming 39:6 clarification 33:3 39:21 40:4 clarify 9:23 22:22 30:3 clear 25:21 31:2 35:23 45:18,23 close 44:10 49:12,18,21,22 49:24 50:10 clothes 30:15 Cloutman 3:22 3:22 4:1 6:11 6:11 50:12 51:6 57:2,3,7 collecting 16:24 color 24:19 25:1 colors 25:23 combination 43:7 come 19:11 21:10 41:21 coming 40:7 comments 14:17 COMMISSION 54:9 communi 27:3 communicate 49:3,8,11,15 communicates 9:9 communication 25:22 29:4 communicatio... 7:8,14,17,19 7:20,25 8:10 8:11,13,20 9:4 10:5 14:22 15:17,25 16:19	16:22 20:12,18 23:24 26:1,14 27:4,5 29:8 32:25 33:4,11 33:16 48:8 50:2 communicators 27:3 community 8:22 47:8 comp 32:24 company 6:4 13:5 30:24 32:3,4,22,23 36:13 40:11 43:21 44:24 45:16 company's 15:15 19:16 complaints 19:25 20:3 con 50:1 concerned 32:20 concluded 51:10 condensed 51:5 51:7 conduct 16:4 43:24 confusion 30:1 connection 31:19 consider 24:18 25:2 34:5 37:3 37:13,19 consideration 54:2 considered 37:4 consult 26:23 consulted 27:1 contact 29:15,19 contacts 18:4 37:17 contains 29:1 content 34:20 45:9 continuity 8:25	contribution 8:23 conversation 12:3 21:16 25:9 26:4,5 29:25 42:11 46:6,19,20,21 46:23 47:3 48:4,16 conversations 14:9 42:3 46:4 47:18 copies 57:13 copy 51:2,3,7 copyrighted 34:25 corporate 7:20 8:24 20:11 23:23 27:3 28:11 47:9 correct 13:17 15:10 22:9 28:15 37:15 53:6 correcting 22:2 counsel 4:7 6:7 41:6 56:6 57:15 COUNTY 53:17 Court 1:1 33:3 39:21 40:4 55:1 court's 6:21 coworkers 17:18 crafting 24:8 create 47:5 48:2 48:24 created 24:14 26:4 creating 25:19 creation 26:20 33:12 cross-functional 9:2 CSR 1:23 58:2	culture 7:13,16 7:21,24 8:8 current 33:7 customer 13:2 13:14,18 customers 27:10 27:18 46:1,10 47:15 customize 22:20 22:24 <hr/> D <hr/> D 3:4 56:3,9 D.C 21:2 25:17 28:25 30:5,7 48:6 daily 11:5,25 12:3 Dallas 1:2 3:17 3:23 4:2 55:2 56:22 57:4,8 58:6 data 7:23 Date 52:3 58:3 day 38:2 47:14 53:20 54:4 57:21 de 31:13 dealing 40:16 DEFENDANT 3:14,20 56:19 57:1 Defendants 1:8 55:9 Defense 3:9 56:14 deliver 47:14 department 9:3 18:15 20:12,17 20:19 26:1 32:11 33:16,17 department's 8:16 departments 7:18 27:2 45:15,16	depend 30:22 35:16,22,22 36:21 44:23 depending 17:25 depends 15:23 30:13 31:13,14 34:11 35:11 36:2,4,9,15 44:11 45:9 47:2,2 deposition 1:12 1:18 6:2 12:9 12:13 41:5,10 42:12 51:10 53:5 55:12,20 55:22 56:2,5 57:11,13 derive 10:17 derived 11:24 11:25 describe 8:13 16:6 description 5:10 53:22 desire 16:7 determine 9:12 develop 8:19 9:5 27:4 33:1,5 developed 24:16 25:9 development 32:10 different 13:15 35:20 40:6,11 46:4 differentiation 14:11 digital 9:13 10:9 direct 12:7 23:5 25:6 26:8 directly 12:14 director 8:8,10 24:3,3 directors 8:7 directs 15:3
--	---	--	---	--

disagreement 39:1	47:10 Ecloutman@l... 3:24 57:5	16:5 encouraging 27:17	explicit 31:24 explore 15:6 Expre 34:16	25:5 26:15,19 27:17 38:1,2 48:14,23
disapprove 26:2	Ed 6:11	endorsement 21:20,24 30:2	express 19:15 expressed 17:11	fly 47:8 focus 16:16
disapproved 25:22	Edward 3:22,22 57:2,3	48:5	54:2	23:16
discipline 20:14	effect 25:12,14	endorser 22:1,4	expresses 18:13	focused 16:12
disciplined 19:22 25:19	efforts 13:22 14:4,15 15:7	22:8,11	expressing 16:17 17:8	followers 17:24
38:8 42:16	28:11	endorsing 25:17	19:4,13,22	following 55:17
43:6,12,17	Eichinger 8:8	engagement 7:22 8:9	45:2	56:6
discourse 48:7	either 40:1,5 42:18,24	engaging 27:10	expression 34:16	follows 7:1 56:2
discovery 41:11	Elm 3:23 4:2 57:3,7	ensure 41:2	extension 47:13	Forbes 4:7
discriminated 39:4,9 40:23	Email 5:11,11 5:13	entered 48:6	extent 9:17	foregoing 53:5
discuss 42:6 47:25	emergency 7:21 8:25	enters 27:7	external 23:17 23:18	53:24
discussed 11:6	employ 30:14	entire 48:13	<hr/> F <hr/>	form 9:18 11:14
discussion 28:1 42:22	employed 57:16	entities 46:1	Facebook 9:7 11:7 36:24	11:21 14:2
disruptive 31:15	employee 5:13 7:22,23 17:7	entity 47:9	44:15,19	15:20 18:16
distri 45:14	18:13 19:4,13	environment 22:25 48:25	fact 48:3	20:15 24:21
distribution 23:16 45:14	19:17 30:15	equipment 36:12	familiar 13:11	25:24 27:12
DISTRICT 1:1 1:1 55:1,1	34:6,17 35:12	ethics 43:25	fax 58:7	30:9,20 31:10
DIVISION 1:2 55:2	35:25 36:2,10	evaluation 33:6	feature 22:20	32:6 34:8 35:9
document 12:9 27:13 53:23	38:4,9,14 39:3	event 22:1,5,8 22:11 32:1	Federal 2:1	35:9 38:19
documentation 40:19	39:16 40:10	48:5	feed 38:6,10 43:1,8,15,19	44:20 46:22
documents 41:9	43:14,18 44:9	events 7:24 31:4	44:6	former 13:1
doing 9:8 19:2	45:1,6	examination 5:5 7:2 55:24	feel 22:16	forward 12:14
36:3,5,6 43:18	employee's 14:17 15:8	example 36:12 44:14	fellow 18:1	forwarded 12:8
due 32:21	16:4	executed 54:1	felt 20:14	12:14
duly 1:20 6:25 55:18	employees 11:12 13:9,23 14:5	execution 47:14	financially 57:19	Foundation 3:9
duty 40:2,6	14:13 15:13,18	executive 7:7	find 16:25	56:14
<hr/> E <hr/>	15:25 16:17	Exhibit 12:7,22 12:24 13:12,20	finds 18:21	frame 10:21
E 3:1,1	18:1 19:21	23:3,4,6 26:9	Firm 58:5	friends 17:25
e-mail 12:23 13:4,5 23:5,7,9	22:17 25:18	26:11,12,17	first 6:25 21:13 23:6 29:11	36:24
23:12,12,20	30:6 35:4	27:24,25 28:7	41:2	full 29:24
earlier 42:17	37:11,18 40:1	33:23,24,25	five 12:13	further 50:5
45:11 46:18	40:5,20 42:19	34:2	flag 11:10,11,18	57:15,18
	42:23,24 43:3	exhibits 5:9 57:14	flight 20:23 21:2 21:17 22:17,23	<hr/> G <hr/>
	43:4,5 47:13	Expiration 58:3	24:19,25 25:1	general 4:7 16:7
	employment	EXPIRES 54:9		16:11,23

Gilliam 3:8 6:13 56:13 given 54:3 55:21 56:4 global 47:4,5 go 5:12 16:14 18:8 26:13 28:2 32:19 45:24 going 23:2 27:23 33:22 42:7 51:8 good 8:12 16:12 47:8 graphics 34:24 great 47:7,7 Greenfield 4:1,1 27:7 57:6,7 group 7:22 9:2 10:8 23:9,12 23:16 26:15 45:14 groups 46:9,12 Grove 46:17	6:13,19 7:3 10:23 12:16,20 17:14 28:2 37:7,22 41:20 42:10,15 46:23 49:14,20,25 50:5,16 56:3,9 hold 7:12 home 46:16 honestly 17:15 18:9 hopefully 41:21 Hot 29:13 HOOR(S):54 56:3 housekeeping 50:10,14 Hudson 47:21 hypothetical 15:21 30:13,20 31:11 32:7 34:9 44:21	included 23:20 26:17 includes 56:6 inconsistent 32:15 incorrect 22:6 INDEX 5:1 indicate 50:13 individual 11:10 11:11 15:12 industry 12:5 46:2,3,7,12 inflight 5:12 26:13 41:17 48:11 Info 5:12 26:13 information 13:10 30:23 56:4 initially 33:1,5 inquiries 24:16 inquiry 17:6 19:18 insights 7:23 instance 1:19 26:3 instructed 42:14 instrument 53:25 intended 47:12 interest 24:14 interested 16:15 57:19 internal 8:20 26:14 41:16 internally 40:10 interpret 27:15 interpretation 27:16 introduce 7:4 invested 39:13 investigate 14:16,17 15:8 15:12 investigated 34:21 39:13	investigating 17:2 investigation 18:24 19:18,20 investment 8:23 involved 15:16 24:8 26:20 33:11 involvement 21:21 issue 12:2 13:11 15:17 16:20 issues 11:20 22:13 items 41:11	L Lacore 47:23,25 48:9,10 Lauren 4:8 Laurie 8:9 law 1:25 3:22 57:3 leader 39:11 learn 21:5 learned 20:12 21:14 22:19 39:2 legal 3:9 32:25 33:4,17 56:14 let's 15:4,5 28:2 30:14 light 24:19 40:2 40:6 lighting 22:17 22:21,25 25:1 41:13 48:20 lights 13:11 20:21 21:1 25:7,23 47:17 47:19 limit 49:13 Linda 1:13,18 5:4 6:2,24 7:6 12:15 52:2 53:4,12,20 55:12,18 link 29:1 listed 17:4 listen 46:9 listening 10:17 11:4 14:8 21:11 24:14 28:11 45:12,20 45:25 lists 34:18 living 44:16 Local 1:7 3:21 6:5,12 50:13 51:6 55:7 57:1 logo 31:18 32:3
H hand 54:3 happen 44:17 happening 12:4 21:16 28:13 46:6 happens 42:12 Harwood 3:16 56:21 head 17:21 headed 21:2 heading 23:7 held 7:9 help 8:1 9:4 21:18 27:4 40:1,5,9 48:17 48:24 helpful 40:18 hereto 2:3 Hey 10:19 Hill 3:4 5:5 6:13	I identified 30:16 37:17 44:8,25 45:5 identifies 38:3 identifying 38:9 38:13 42:18 43:13 identity 53:23 III 3:22,22 57:2 57:3 illuminated 21:7 im 34:14 image 34:24 36:22 implicate 34:13 34:15 implied 21:20 30:2 31:6 48:5 impression 22:4 inappropriate 22:16 43:19 include 10:8	J Jacinto 3:5 56:10 January 5:11,11 5:12,13 7:9 20:21 49:9 Jim 12:24 13:1 job 7:9,12 40:3,7 July 55:25 June 1:14,21 6:6 6:22 52:3 55:13,23 57:21 jury 7:5	K Kerrie 4:7 41:8 know 12:15,25 15:14 16:14 17:4 22:12 23:15 26:18,18 26:18 27:1,4 32:23 33:7,8 37:25 39:19,24 40:13,17 43:20 45:15 49:1 knowledge 14:14 38:22 known 40:12 53:21 knows 20:16,17	

32:4 34:23 logos 32:13 look 9:13 12:9 15:1 31:25 46:1 looking 40:10 looks 13:14 34:3 lot 17:24 35:20	MATTHEW 3:4,8 56:3,9,13 Mbg@nrtw.org 3:12 56:17 McKeeby 3:15 6:9,9,18,20 9:18,21 10:19 11:14,21 12:8 12:12,18,21 14:1,7,20 15:20 17:13 18:6,16 20:15 24:21 25:4,24 27:12 30:9,19 31:10,21 32:6 32:17 34:8,14 35:7 37:6,20 38:19 42:7,13 44:20 45:7,22 46:21,25 49:12 49:16,23 50:7 50:14,17,21,24 51:2,4 56:20 McKinney 58:6 mean 18:9 30:12 37:22 meant 14:9 measures 50:15 media 5:13 8:21 9:10,25 10:4 10:11,15 11:2 11:12,19,20 13:16,24 14:6 14:18,24,25 15:9,12,15,19 16:1,4,18 17:1 17:9,12,19,24 17:24 18:5,13 18:22 19:10,11 19:16,23 20:1 20:6,13 21:6 21:11 23:18 24:14,16 28:13 32:24 33:14 34:4,7,17 35:4 35:25 37:1,17	38:5,10,18,24 41:12 42:20,25 43:8 44:1 46:13,24 47:11 47:16 48:4 medical 40:8 meet 41:7 Melody 1:23 55:15 58:2,5 member 23:15 23:23 members 23:17 mentioned 12:6 29:25 46:12 mentions 34:22 message 21:19 27:9,16 32:15 Mhill@pryor... 3:7 56:12 Mike 41:17 mind 24:11 minute 49:16 MINUTE(S) 56:3 minutes 12:13 misperception 25:19 misunderstan... 25:15 mix 29:24 mixed 30:1 monitor 10:10 10:12 13:22 14:4 46:4,13 monitored 11:7 45:20 46:5 monitoring 19:11 Monk 1:23 55:15 58:2,5 multiple 10:7 45:12,15,16,19 46:5 47:6	name 7:6 52:2 53:24 named 12:24 22:7 Naomi 47:21 narrative 25:8 25:14 26:5 narrow 15:5 National 3:9 56:14 necessarily 12:1 need 16:14 18:14 40:1,3,5 44:4 48:8 needed 26:4 30:3 32:21 40:20 48:17,19 negative 25:12 neither 57:15 net 25:12,12,14 new 9:13 22:19 48:21 nexus 16:5 31:14 32:2 44:8,10 North 3:5,16 56:10,21 NORTHERN 1:1 55:1 NOTARY 54:8 noted 49:17 53:6 number 8:20 12:19 31:15 numbered 1:21 numerous 37:11 37:16	objecting 14:1 objection 14:7 24:21 25:4 30:19 31:21 34:8 44:20 45:7 46:25 objective 47:4,5 objectives 46:19 occurrence 20:24 office 1:25 54:3 officer 55:19 56:5 officer's 57:11 offices 1:25 3:22 57:3 okay 6:15 8:11 11:18 12:21 13:8,15,18,22 14:11 18:25 27:6 31:17 33:22 35:12,17 36:5,23 41:18 42:15,16 43:11 44:3,12 45:2 50:9,19 51:1,8 onboard 27:18 27:22 ones 46:15 operated 34:25 operation 31:15 47:15 opinion 16:3 18:13 19:5,14 34:17 opinions 15:24 16:18 17:8,11 17:13,15,18 18:4 19:22 27:11,19 34:7 45:3 opportunity 22:22 48:20,22 oral 1:12,18 55:20 order 6:21
<hr/> M <hr/> Maberry 4:6 machine 1:24 main 46:15 major 11:5,8 making 40:18 manage 8:20,21 8:21,23 9:16 9:24 21:19 26:4 48:8 managed 8:24 manager 24:2 manages 26:2 managing 8:7,8 8:9 24:3 46:18 46:19 manual 25:6 March 21:3,22 22:15,18 25:17 28:19 29:5,9 30:5,7,17 31:1 31:5,8,20 32:13 47:18 50:3 Marchers 28:24 marked 12:22 23:2,4 26:11 27:25 33:23,24 marketing 9:4 marking 27:23 material 35:21 materials 35:1 Matt 6:13,13 10:19 12:12 49:12 matter 22:1 matters 50:10		<hr/> N <hr/> N 3:1	<hr/> O <hr/> oath 53:21 object 9:18 11:14,21 15:20 18:16 20:15 25:24 27:12 30:9 31:10 32:6,17 35:8,9 38:19 46:22	

original 57:13 outcome 26:3 57:19 outlines 15:15 outreach 7:19 8:10,12,13 overall 27:8 owned 34:25	Pecan 46:17 pendency 42:12 people 7:7 9:2,3 9:16 10:3 16:13 17:1 42:17 perception 8:2 period 40:7 49:9 49:22 periodic 13:13 permission 32:5 person 40:25 44:4,13 53:23 personal 19:15 36:11 38:6 43:1 personality 9:11 47:13,16 personally 10:10,12 17:10 26:25 33:19 53:20 philanthropic 8:23 philanthropy 7:20 philosophy 16:10,11 phone 58:7 photo 25:8,10 25:12,15 26:3 26:6 35:16,18 36:3 picture 29:1 35:13,13,25 48:3 pictured 13:12 13:19 pictures 36:24 piece 8:16 34:19 pieces 8:18 pink 13:10 20:22 21:1 41:13 47:17,19 place 47:7 Plaintiff 1:4,20	3:3 55:4 56:8 57:12 planes 27:18 Planned 28:16 28:18,22,23 29:5,8,12,16 29:19 plans 8:25 platform 7:24 please 6:7 7:5 12:10 PLLC 4:1 57:7 Pmckeeby@r... 3:18 56:22 polarizing 27:22 policies 24:20 25:3 policing 16:20 policy 5:14 14:24,25 15:1 15:15 16:5 17:1,5 18:22 18:24 19:10,16 19:18,19 30:24 32:22,24 33:1 33:5,6,8,12,15 33:18,19 34:4 34:6,12,18,18 34:20 35:15,25 36:13,17 37:6 37:10,13,19 38:5 43:21 44:1,7,14,18 44:25 political 5:12 15:18,24 16:3 16:8,15,18 17:8,13,15,17 18:3,12 19:5 19:22 22:13 27:11,19,21 30:4 34:7,16 45:2 politically 22:14 pop 12:16 popped 41:12	popular 11:13 population 48:14 portrayal 30:23 position 10:2 16:7 22:14 30:4,5 31:3,7 positions 15:18 16:9,15 possible 9:17 post 34:6 35:25 45:10 posted 38:17,23 posting 35:4,13 36:24 37:9 postings 37:9 posts 14:12 15:9 15:12 20:1,6 20:13 21:7 37:11,16 potential 19:9 19:17 predominantly 46:10 47:15 preparation 41:10 prepare 41:4 prepared 24:15 preparing 57:12 present 4:5 32:16 presented 35:21 president 7:7,13 7:16 48:10 presidents 8:6 pretty 41:22 previously 29:25 primary 16:16 privilege 42:9 probably 9:15 problem 31:9 32:5 35:3 36:18,19 45:4 48:18 problematic	30:8,18 Procedure 2:1 proceed 14:3 proceeding 57:18 process 15:1,16 16:24 18:23 35:8 produced 1:19 prohibitive 34:19 44:1 proper 36:11 properly 41:3 protection 36:11 proud 38:1 proved 53:21 provisions 2:2 Pryor 3:5 56:10 public 8:1,15 22:12 30:4 48:7 54:8 purchase 51:2,3 51:4 purpose 24:11 31:4 purposes 54:1 pursuant 2:1 6:21 56:4 put 26:9
P P 3:1,1 p.m 1:22,22 6:6 51:9,10 page 5:1,6,7,10 44:19 PAGELINE 52:4 Paralegal 4:8 Parenthood 28:17 29:5,8 29:12,16,19 Parenthood's 28:18,24 Parenhoods's 28:22 part 8:12 9:8,11 9:15 15:6 21:6 33:10 44:15 participation 31:19 particular 7:19 14:17 15:8,13 16:2 18:21 28:16 parties 3:2 56:7 57:17 partnerships 8:22 parts 34:12 party 56:1 passengers 21:7 path 40:11 Paulo 3:15 6:9 41:8 42:5 56:20 pay 18:10,10	P P 3:1,1 p.m 1:22,22 6:6 51:9,10 page 5:1,6,7,10 44:19 PAGELINE 52:4 Paralegal 4:8 Parenthood 28:17 29:5,8 29:12,16,19 Parenthood's 28:18,24 Parenhoods's 28:22 part 8:12 9:8,11 9:15 15:6 21:6 33:10 44:15 participation 31:19 particular 7:19 14:17 15:8,13 16:2 18:21 28:16 parties 3:2 56:7 57:17 partnerships 8:22 parts 34:12 party 56:1 passengers 21:7 path 40:11 Paulo 3:15 6:9 41:8 42:5 56:20 pay 18:10,10	P P 3:1,1 p.m 1:22,22 6:6 51:9,10 page 5:1,6,7,10 44:19 PAGELINE 52:4 Paralegal 4:8 Parenthood 28:17 29:5,8 29:12,16,19 Parenthood's 28:18,24 Parenhoods's 28:22 part 8:12 9:8,11 9:15 15:6 21:6 33:10 44:15 participation 31:19 particular 7:19 14:17 15:8,13 16:2 18:21 28:16 parties 3:2 56:7 57:17 partnerships 8:22 parts 34:12 party 56:1 passengers 21:7 path 40:11 Paulo 3:15 6:9 41:8 42:5 56:20 pay 18:10,10	P P 3:1,1 p.m 1:22,22 6:6 51:9,10 page 5:1,6,7,10 44:19 PAGELINE 52:4 Paralegal 4:8 Parenthood 28:17 29:5,8 29:12,16,19 Parenthood's 28:18,24 Parenhoods's 28:22 part 8:12 9:8,11 9:15 15:6 21:6 33:10 44:15 participation 31:19 particular 7:19 14:17 15:8,13 16:2 18:21 28:16 parties 3:2 56:7 57:17 partnerships 8:22 parts 34:12 party 56:1 passengers 21:7 path 40:11 Paulo 3:15 6:9 41:8 42:5 56:20 pay 18:10,10	P P 3:1,1 p.m 1:22,22 6:6 51:9,10 page 5:1,6,7,10 44:19 PAGELINE 52:4 Paralegal 4:8 Parenthood 28:17 29:5,8 29:12,16,19 Parenthood's 28:18,24 Parenhoods's 28:22 part 8:12 9:8,11 9:15 15:6 21:6 33:10 44:15 participation 31:19 particular 7:19 14:17 15:8,13 16:2 18:21 28:16 parties 3:2 56:7 57:17 partnerships 8:22 parts 34:12 party 56:1 passengers 21:7 path 40:11 Paulo 3:15 6:9 41:8 42:5 56:20 pay 18:10,10
	Q ques 45:18 question 9:19 10:24 11:15,22 14:2 15:21 18:7,17 19:7 24:22 30:10,12 34:9 35:8 37:23,24 38:20 39:7 42:21 43:10 44:21 45:18 49:18 questions 49:21 50:6,8,13 quickly 41:22			

R	Registration	22:15	13:1,8	48:3
R 3:1	58:5	required 42:11	Rutherford 1:13	sharing 27:10
Rachel 23:22,23	regular 10:16	respect 47:17	1:19 5:4 6:2,24	27:19
raised 11:20	21:11 28:10	respond 24:16	7:4,6 28:6 42:2	short 41:20
48:19	33:6	49:18	50:18 52:2	shorthand 1:25
raising 27:21	regularly 49:3,8	response 7:21	53:4,12,20	55:15
Rapid 13:2	related 41:12	8:21,25 23:18	55:12,18	show 23:2 27:23
reach 9:13	57:16	24:17		33:22
reaction 21:13	relations 13:2	responsibilities	S	showed 20:8
21:18 29:22	13:14 39:16	7:15	S 3:1 4:1 57:6	shows 25:22
read 50:23,25	relationships	responsibility	safely 16:13	29:24
53:4	8:22	8:17 31:24	San 3:5 56:10	sic 23:8
real 49:24	release 40:8	32:9,10 39:12	saying 9:16 10:3	side 7:25
realized 22:21	religion 39:5,9	48:12,13	13:23 35:23	sign 33:14,19
really 9:24 10:5	40:16,24	responsible 8:14	37:25	50:23,25
11:24 16:12	religious 40:20	17:2 23:18	says 8:14 13:3	signature 5:6
30:2	repeat 10:24	result 25:9 26:6	19:13 23:7	50:20 52:1
reason 22:10	39:7	resulted 25:15	28:17,22 44:15	53:5 55:24
52:4	rephrase 19:8	resulting 25:8	44:16	signed 33:17
recall 17:16,20	report 11:5 12:1	return 55:25	screen 12:17	signs 30:16
18:10	12:3 13:8	revealed 42:23	26:9 41:12	simply 21:25
receive 10:16	19:12 29:13,24	review 41:9	Scrolling 23:19	Sims 26:23
11:1,19 13:18	39:12,15,16	Rewards 13:2	seal 54:3	41:17
23:14 45:17	reported 1:24	right 3:9 16:21	second 12:23	single 37:8
received 13:9,10	8:4 11:8 14:10	17:14 18:1,5	23:5 28:3	situation 20:20
19:25 28:14	33:13	22:5 25:13,23	secure 36:11	44:11 48:1
29:12	reporter 6:1,15	27:20 28:14	see 23:19 47:16	Smith 3:16
Recess 28:4	28:5 33:3	31:1,6 32:16	seeing 17:17	56:20
41:25	39:21 40:4	35:1,19 36:8	18:3	social 5:13 8:19
recipients 23:11	41:24 42:1	36:16,20 37:7	seen 13:13 24:5	9:1,5,9,24 10:4
recognition 7:24	50:9,19,23	37:14 38:5,12	28:6 37:8,9,10	10:8,9,11,15
recognize 13:4	51:1,8 55:16	38:15 41:1	37:11,16 43:3	10:17 11:2,4,6
23:9 26:12,13	Reporter's 5:7	42:20,25 43:15	43:4	11:12,19,20
26:16 33:25	55:11	48:18,25 49:23	send 50:24	12:4 13:15,23
recollection	reporting 13:14	56:14	senior 4:6 7:13	14:5,6,8,12,18
17:23	16:23,24 18:20	Road 3:10 56:15	7:16	14:24,25 15:9
record 2:2 6:1,8	19:9 21:6,12	Rockwall 3:6	sent 12:12	15:12,14,15,19
22:2,9 28:1,2,5	23:25 24:13	56:11	sentiment 11:9	16:1,4,18 17:1
41:23,24 42:1	28:10 58:5	role 8:4 10:5	30:1	17:8,12,18,24
50:11 51:9	reports 10:13,16	40:15	separate 37:23	17:24 18:4,13
55:20 56:7	10:18 11:1,19	roles 8:1 10:2	September 6:22	18:22 19:10,11
recurring 13:21	11:24 13:11,13	room 27:7	series 40:17	19:16,23 20:1
Reed 3:16 56:20	13:16,19 20:9	RPR 58:2	service 17:25	20:6,13 21:6
refer 18:14	24:2,2,3,4	Rules 2:1	shape 8:1	21:11 24:14
40:25	28:12	running 16:12	shaping 9:9	26:6 28:13
	represented	Ruppel 12:24,25	shared 26:6,19	32:24 33:14

34:4,7,17 35:4 35:24 36:25 37:17 38:5,10 38:17,23 39:1 42:20,25 43:8 43:25 46:23 47:11,16 48:4 somebody 32:4 Sonya 47:23,24 47:25 48:9,10 sorry 6:22 10:25 11:11 14:5 18:11 19:3,6 27:24 28:20 35:7 39:7 40:13 43:9 South 25:21 Southwest 1:6 3:14 4:6,7,8 5:13 6:3,10 7:8 8:2,14 9:5,9,12 9:17 10:3,6,11 10:14 11:11 12:4 13:6,9,23 14:5,12 16:19 18:1 19:1,2,14 20:22 21:19,23 21:25 22:4,7 24:20 25:3,16 28:17 29:7,18 30:6,8,17,18 30:25 31:2,7 31:18 32:12,13 34:17,25 35:3 35:5,14 36:1,3 36:7,9,17,19 36:25 37:12,18 38:1,2,3,9 39:3 40:9 42:19,24 43:3,4,6,13,14 43:18 44:5,9 44:16 45:1,3,5 48:14,21 51:7 55:6 56:19 Southwest's 16:7 25:21	28:19 32:24 34:23 35:24 47:10,11 SouthwestAir 28:23 spaces 12:4 speak 25:5,7 36:14 speaks 27:13 specific 11:19,19 12:2 17:22 specifically 15:14 17:4 spend 16:12 spoke 42:5 sponsor 21:25 22:5,7,11 sponsoring 25:16 32:1 sponsorship 21:21 Springfield 3:11 56:16 stakeholder 46:8 stakeholders 9:14 10:7 45:13,19,21 46:5 47:6 stances 22:13 start 28:20 started 9:6 11:3 state 1:24 6:7 53:16 54:9 55:16 stated 2:2 statement 23:19 24:5,9,17 26:16,19,21,24 27:9 41:13,16 states 1:1 19:13 44:7 55:1 stayed 33:7 stipulations 6:16 Stone 47:19 49:1	49:4 50:2 strategies 7:20 strategy 8:19 9:1 Street 3:16,23 4:2 56:21 57:3 57:7 string 12:23 structure 24:1 submitted 55:22 subscribed 53:24 Suite 3:10,17 56:15,21 support 22:18 supporters 28:19,20,24 supporting 31:1 supposed 25:7 sure 10:20 33:7 39:13 40:18 45:22 48:22 surely 18:3 surveying 7:23 suspected 18:22 19:19 SWA Commu... 23:8 swear 6:16 sworn 1:20 6:25 55:19	28:14 talks 13:10 team 14:21,22 15:2,4,8,17,25 16:19,22 18:20 23:17,24 25:22 27:4 32:25,25 33:4,4,11,13 39:20,24 40:18 41:1 48:8 teams 39:14 technology 9:4 tell 42:8 43:22 terms 8:11 16:17 45:2 testified 6:25 testimony 55:21 56:5 Texas 1:1,24 3:6 3:17,23 4:2 46:17 55:1,16 56:11,22 57:4 57:8 58:2,6 text 34:24 Thank 50:17 Thanks 28:17 28:23 themes 11:8,9 16:23,25 18:20 things 11:12 19:10 24:15 34:22 think 14:2 18:6 18:19 thought 40:25 three 44:3 49:7 time 8:24 10:21 11:7 16:12 18:4 21:3 23:1 29:11 33:13 40:7 41:6 49:13,22 56:1 56:5 told 39:8 43:11 top 17:20 topic 12:2 14:10	topics 11:5 16:23 29:13 trademarks 34:24 training 22:22 48:20 transcript 55:19 55:22 57:13 transition 39:20 transitions 40:8 41:1 Transport 1:6 3:20 6:4 46:2 55:7 57:1 true 53:6 55:20 try 8:1 trying 9:15,16 35:7 46:9 turn 16:25 17:3 18:23 19:17 turned 17:7 19:20 20:22 tweet 28:16,22 29:12,23 Twitter 9:7 11:8 two 7:18 8:6,6 41:11 49:7 TWU 6:12 50:13 51:6 typically 22:12
<hr/>				
U				
<hr/>				
Unauthorized 34:23 unaware 20:18 understand 9:22 10:2,6 19:6 22:23 27:21 42:21 43:9 understanding 44:13 understood 48:23 uniform 35:14 36:1,3,7,10,17 36:19 37:21,23				

42:24 43:3,4,6 43:13 uniforms 35:5 36:25 37:12 Union 1:7 3:20 6:4 55:7 57:1 UNITED 1:1 55:1 universally 38:24 use 18:21 31:18 32:3 34:23 35:22 48:24 users 11:10	violations 14:25 19:10,12 43:20 43:22,24,25 44:1,2,4 viral 11:13 Virginia 3:11 56:16 voice 9:5 47:10 47:11 VP 13:1 VS 1:5 55:5	27:18 Whitney 8:7 witness 1:19 6:17 52:2 55:18,21,23,24 Witness's 5:6 WNCO.com 13:3 Women's 21:3 21:21 22:14,18 25:17 28:19,24 29:5,9 30:5,7 30:17 31:1,4,8 31:19 32:13 47:18 50:2 word 33:9 words 12:1 40:2 work 3:9 27:2 33:1,5 44:16 47:7 56:14 worked 7:18 Workers 1:6 3:20 6:4 55:7 57:1 working 9:3,3 works 15:16 world 9:10 wouldn't 22:10 31:9 32:5 40:24,24 wrapping 49:13 49:19,21	0 00 56:3 1 1:06 1:22 51:9 51:10 10/21/2022 58:3 10821 58:5 12 5:11 12:03 1:22 6:6 139 5:13 27:24 27:25 28:7 1404 58:6 1500 3:17 56:21 16 6:22 169 27:24 1714 46:17 1999 58:6 2 2 5:2 20 5:11,11,12 2016 34:3 2017 5:11,11,12 5:13 7:10 8:5 10:22,23 11:3 11:25 14:6 20:21 49:9 2022 1:14,21 6:6 6:22 52:3 55:13,23,25 57:22 214.232.9015 3:24 57:4 22160 3:11 56:16 23 1:14,21 5:11 52:3 55:13 23rd 6:6 24 5:13 24th 57:21 26 5:12 27 5:13 2850 3:16 56:21 29 55:23,25	3 3:17-cv-02278... 1:6 6:5 55:6 302 3:5 56:10 33 5:14 3301 3:23 4:2 57:3,7 3613 58:2 37 5:12 26:9,11 26:12,17 4 5 52 5:6 55 5:7 556 1:7 3:21 6:5 6:12 50:13 51:6 55:8 57:1 6 600 3:10 56:15 62 5:11 23:3,4,6 63 5:11 12:7,20 12:22,24 13:12 13:20 7 7 5:5 703.321.8510 3:11 56:16 75007 46:17 75087 3:6 56:11 75201 3:17 56:22 58:6 75226 3:23 4:2 57:4,8 8 8001 3:10 56:15 888.988.5317 58:7 9 9 5:13 33:23,24 33:25 34:2
V vaccine 40:21 vaccines 40:18 various 9:14 version 34:3 51:5 versus 6:3 vetted 41:3 vice 7:7,13,16 8:6,6 48:10 video 34:24 Videoconferenc... 1:12,18,23 3:2 view 44:17 viewed 25:11 30:25 views 27:21 violated 15:2 16:5 violates 35:15 38:5 violating 36:16 violation 16:25 18:21,22 19:17 19:19 24:19 25:2 30:23 32:22 34:6 35:18,19,24 36:6,7,13 37:5 37:10,13,19 44:13,18,24	W wait 49:16 waive 50:23 want 10:20 15:25 20:20 21:23 22:10 26:8 32:16 35:23 41:20 51:1,3 wanted 22:3,8 24:15 30:25 31:2 48:24 50:12 warranted 20:14 Washington 21:2 25:17 48:6 wasn't 12:1 21:25 way 8:12 10:1 31:3,8 44:5 ways 9:13 35:21 46:4 we'll 41:21 we're 16:14 17:25 49:13,23 we've 42:2 wearing 30:15 35:5 36:7,17 36:18 37:21 weekend 28:25 weigh 21:15 welcoming	X Y yeah 9:20 12:11 12:18 31:13 32:20 34:18 37:22 45:25 49:25 50:24 years 9:6 49:7 Z Zoom 1:22 3:2		

972.771.3933 3:6 56:11				
----------------------------------	--	--	--	--